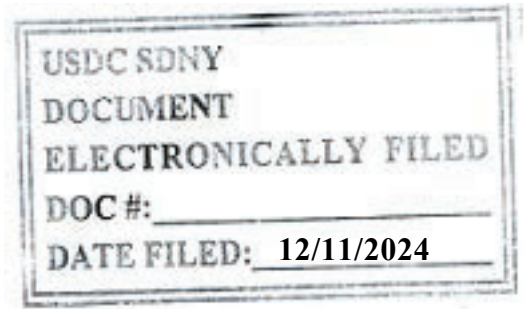


MEMO ENDORSED



Office of the New York State
Attorney General

Letitia James
Attorney General

December 10, 2024

Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

In light of the extension of the discovery deadlines, the parties' joint request to adjourn the Jan. 29, 2025 Status Teleconf. is GRANTED. The Status Teleconf. is adjourned until May 29, 2025 at 10:00 am. Dial-in instructions shall follow. Clerk of Court is requested to terminate the motion at ECF No. 75. Dated: White Plains, NY

December 11, 2024

Re: *John Hamlett v. C.O. Taj K. Everly, et. al., 21-CV-6663 (NSR)*

SO ORDERED:

Dear Judge Roman:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

This action is a 42 U.S.C. § 1983 brought by incarcerated represented Plaintiff John Hamlett. I am the attorney assigned to this matter on behalf of the Defendants Everly, Dillon, Perrotta, Alban, T. Germano, Flanagan, and Kopp¹, ("Defendants") by their attorney, Letitia James, New York State Attorney General.

I am submitting this joint letter with consent from opposing counsel to request an adjournment of the conference presently scheduled with Your Honor on January 29, 2025.

Presently, Plaintiff's counsel and I are engaged in discovery. Most recently, we appeared for a conference with Judge Krause on December 10, 2024, and discovery deadlines were reset. Specifically, responses to interrogatories and requests for productions of documents are due January 31, 2025. All depositions are to be completed by March 31, 2025. Expert disclosures are to be completed by April 4, 2025, and Expert depositions are to be completed by April 15, 2025. Discovery is to be concluded by April 30, 2025. The next conference with Judge Krause is scheduled for February 14, 2025, to ensure discovery is moving forward.

Accordingly, the parties are requesting the post-discovery conference be adjourned from January 29, 2025, to May 9, 2025, or another date the Court prefers, to allow time for the completion of all discovery.

¹ The remaining originally named defendants were dismissed after motion practice, per the Court's opinion and order dated April 30, 2024. (see ECF #56).

Respectfully submitted,

Robert Feliu

Robert C. Feliu

Assistant Attorney General

New York State Attorney General's
Office

44 South Broadway, 5th Floor,

White Plains, NY, 10601

914-422-8768